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PAPER EXCELLENCE

NORTHERN PULP EFFLUENT TREATMENT FACILITY STAKEHOLDER ENGAGEMENT PLAN

1.1 PURPOSE AND SCOPE

Northern Pulp Nova Scotia Corporation (NPNS), supported by owner Paper Excellence Canada (PEC), began the official environmental assessment process with the province of Nova Scotia on January 30, 2019 with the submission of its effluent treatment facility (ETF) project registration document.

On March 29, 2019 Nova Scotia Minister of Environment called for a project focus report, stating information required to make a decision was not part of the company's document. Terms of Reference framing the Focus Report were provided to NPNS on April 23, 2019.

While the pre-registration consultations provided stakeholders (including general public) with an opportunity to raise their concerns, it cannot be assumed that all stakeholders raised their opinions. This Stakeholder Engagement Plan (SEP) will assist NPNS with managing and facilitating future engagement through the various stages of the environmental assessment focus report and continued phases of the ETF project including construction, commissioning and operations. This SEP serves as a guide to engagement during the environmental assessment stage. This version of the SEP is an initial guide to engagement and will need to be revised following project approval to inform ongoing stakeholder engagement through the various stages of the ETF project development, construction, operation and closure/rehabilitation.

1.2 OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)

The SEP seeks to define a technically and culturally appropriate approach to consultation and disclosure. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence project decisions. The SEP is a useful tool for managing communications between NPNS, PEC and its stakeholders.

The Key Objectives of the SEP can be summarised as follows:

- Understand the stakeholder engagement requirements of Focus Report Terms of Reference;
- Provide guidance for stakeholder engagement such that it meets the standards of communication, industry best practices;
- · Identify key stakeholders that are affected, and/or able to influence the Project and its activities;

- · Identify the most effective methods and structures through which to disseminate project information, and to ensure regular, accessible, transparent and appropriate consultation;
- Guide NPNS, PEC to build mutually respectful, beneficial and lasting relationships with stakeholders;
- Develops a stakeholder engagement process that provides stakeholders with an opportunity to influence project planning and design;
- Define roles and responsibilities for the implementation of the SEP;
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings and
- Assist NPNS, PEC with securing and maintaining a social licence to operate throughout the life of NPNS.

2.0 OVERVIEW OF STAKEHOLDER ENGAGEMENT

2.1 Stakeholder Engagement

Stakeholder Engagement will be conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions (e.g. by way of meetings, surveys, interviews and/or focus groups), and ensures that this information is taken into consideration when making project decisions. Effective stakeholder engagement develops a "social licence" to operate and depends on mutual trust, respect and transparent communication between a company and its stakeholders. Stakeholder engagement improves a company's decision-making and performance by:

- · Cutting costs: Effective engagement can help project proponents avoid costs, while its absence can be costly both in terms of money and reputation;
- Managing risk: Engagement helps project proponents and communities to identify, prevent, and mitigate environmental and social impacts that can threaten project viability;
- Enhancing reputation: By publicly recognising human rights and committing to environmental protection, project proponents and financial institutions involved in financing the project can boost their credibility and minimise risks;
- Avoiding conflict: Understanding current and emerging issues such as tension around influx and employment opportunities;
- Improving corporate policy: Obtaining perceptions about a project, which can act as a catalyst for changes and improvements in corporate practices and policies;
- Identifying, monitoring and reporting on impacts: Understanding the project's impact on stakeholders, evaluating and reporting back on mechanisms to address these impacts; and
- Managing stakeholder expectations: Consultation also provides the opportunity to become aware of and manage stakeholder attitudes and expectations.

2.2 Principles for Effective Stakeholder Engagement

Stakeholder engagement is typically informed by a set of principles defining core values supporting interactions with stakeholders. Common principles based on best practice include the following:

- · Integrity occurs when engagement is conducted in a manner that fosters mutual respect and trust;
- Commitment is demonstrated when the need to understand, engage and identify the community is recognized and acted upon early in the process;
- · Respect is created when the rights, cultural beliefs, values and interests of stakeholders and neighbouring communities are recognized;
- Transparency is demonstrated when community concerns are responded to in a timely, open and effective manner;
- · Inclusiveness is achieved when broad participation is encouraged and supported by appropriate participation opportunities; and
- Trust is achieved through open and meaningful dialogue that respects and upholds a community's beliefs, values and opinions.

2.3 Engagement Techniques

Engagement Technique	Application of Technique
Information Boards	Use Information Boards in each mill department to reach employees (internal stakeholders/company ambassadors)
Website	 Distribute project information to stakeholder groups, government officials, organizations, agencies and companies and general public
Correspondence by Phone/Email/Text/MailChimp (email distribution tool)	 Distribute project information to stakeholder groups, government officials, organizations, agencies and companies Invite stakeholders to meetings
Print media and radio announcements	Distribute project information to large audiences, and stakeholders Inform stakeholders, general public regarding consultation mediums (ie project website)
One-on-one discussions	 Solicit views and opinions Enable stakeholders to speak freely and confidentially Build personal relations with stakeholders Recording of discussion
Formal meetings	 Present project information to a group of stakeholders Allow the group of stakeholders to provide their views and opinions Build relations stakeholders Distribute and provide easily understood translation of technical documents and terms

	Facilitate meetings using PowerPoint presentations Record discussions, comments/questions raised, and responses Follow up with agreed upon action items
Public meetings	 Present project information to a large audience of stakeholders, and in particular communities Provide mediums for which opinions/comments may be compiled Build relationships with neighbouring communities Distribute non-technical project information Facilitate meetings using PowerPoint presentations, posters, models, videos and pamphlets or project information documents Record discussions, comments/questions raised, and responses
Workshops	Present project information to a group of stakeholders Allow the group of stakeholders to provide their views and opinions Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies Recording of responses
Focus group meetings	Allow a smaller group of between 8 and 15 people to provide their views and opinions of targeted baseline information Build relationships with neighbouring communities Use a focus group interview guideline to facilitate discussions Record responses
Surveys	Gather opinions and views Gather baseline data Record data Develop a baseline database for monitoring impacts
Polling	Gather baseline data Record data Develop a baseline database for monitoring impacts

2.3 Consultation Methods

STAKEHOLDER GROUP	CONSULTATION MEDIUMS
Government officials	· Phone / email / text messaging
	· One-on-one discussions
	· Formal meetings
Neighbouring communities	· Print media, and radio/TV announcements
	· Public meetings
	Focus group meetings
	· Surveys
	· Polling
	· Project website
Employees and retirees	Phone /email /memos/MailChimp (email distribution tool)
	Print media and radio/TV announcements
	Employee information sessions
First Nations (PLFN)	Phone / email / text messaging
	· One-on-one discussions
	· Formal meetings
	Project website
NGO's	Print media, radio/TV announcements
	Public meetings
	Focus group meetings
	· Surveys
	· Polling
	Project website
Industry partners	Phone / email / text messaging
	One-on-one discussions
	Print media, and radio/TV announcements
	Public meetings
	Focus group meetings
	· Surveys
	· Polling
	Project website

2.4 Stakeholder Register

NPNS/PE will maintain a stakeholder register, which shall record all stakeholders, contact details, dates of engagement with comments and include follow up requirements and action items. Example:

Stakehold er Name	Group Affiliated	Contact Email	Contact Phone	Date	NPNS/PE PIC	Comment s	Follow up/Action	Status	

2.5 Study Sharing Register

NPNS will communicate and provide information on the Effluent Treatment Plant Project at different stages of the project including approval(s), construction, commissioning, and operations. As key reports are prepared and finalized for each phase of the project they will be provided and recorded via listing table to the appropriate stakeholders. Example:

	NORTHERN PULP NOVA SCOTIA CORPORATION A PAPER EXCELLENCE COMPANY A PAPER EXCELLENCE COMPANY													
Number	Information Sent	Date	PLFN	Brian Hebert (PLFN Lawyer)	Stephen Schaller (EXP)	Melanie Giffin (PLFN Aquatic Consultant)	OAA	DFO	ECCC	Health Canada	Transport Canada	NSE	Lands & Forestry	TIR
1	PLFN Engagement Document	June 12, 2019	✓	✓										
2	Draft copy of the Country Food Survey	July 2, 2019	✓	✓	✓	✓	✓			✓		✓		
3	Methodology for Impact Assessment of Treated Effluent on Key Marine Species	July 3, 2019	✓	✓	✓	✓	✓	>	\			✓		
4	Link to Environmental Report conducted for Södra Cell Värö Mill in Sweden	July 4, 2019			✓	✓	✓					✓		
5	EEM Monitoring Program for the proposed Effluent discharge location	July 4, 2019			✓	✓	✓					✓		
6	Follow-Up Monitoring Plan for the proposed Effluent discharge location	July 4, 2019	✓	✓	✓	✓	✓					✓		
7	Draft copy of original MEKS that was completed in 2018	July 9, 2019	✓	✓			✓							
8	List of potential air dispersion contaminants of potential concern	July 9, 2019	✓	✓	✓		✓		✓	✓		✓		
9	KSH report on Engineered Wetlands	July 17, 2019	✓	✓	✓	✓	✓		✓			✓		
10	Underwater Benthic Habitat Study	July 22, 2019	✓	✓	✓	✓	✓	\				✓		
11	Marine Sediment Sampling Program	July 22, 2019	✓	✓	✓	✓	✓		\			✓		
12	Draft copy of the MEKS	August 1, 2019	✓											
13	Temperature Profile of Caribou Harbour	August 7, 2019	✓	✓	✓	✓	✓					✓		
	Air Dispersion Modelling Study	August 28, 2019										✓		
14	Air Dispersion Modelling Study	September 5, 2019							✓	✓		✓		
	Air Dispersion Modelling Study	September 6, 2019	✓	✓	✓		✓							
15	Freshwater Fish & Fish Habitat	August 30, 2019	✓	✓	✓	✓	✓	✓				✓		

3.0 IDENTIFIED STAKEHOLDERS

Internal/External

- Employees (and families)
- Retirees (and families)
- Woodlot owners groups
- Wood Products Association
- Suppliers/Vendors
- Northern Pulp Community Liaison Committee (CLC)

Government Officials and Elected Representatives

- Premier
- Minister of Aboriginal Affairs
- · Key Premier's office officials
- · Transportation & Infrastructure Renewal Minister
- Nova Scotia Environment Minister
- Natural Resources Minister
- Energy Minister
- · Finance Minister *Deputy Premier
- Internal Services
- Business Minister
- Urban MLAs
- Mayor(s) and local government officials
- Local MLA's (Tim Houston Leader of the Opposition), Karla MacFarlane, Pat Dunn)
- · Liberal Member of Parliament Sean Fraser
- Pictou Landing First Nation Chief
- · Pictou Landing First Nation Council
- Pictou Landing Band office (Economic Development, Fisheries, Human Resources, Forestry)
- Nova Scotia Members of Parliament
- Federal Minister Environment Canada & Climate Change
- · Federal Minister Department of Fisheries and Ocean
- · Federal Minister Transport Canada
- · Federal ministry related bureaucrats, reviewers
- · Provincial ministry related bureaucrats, reviewers

Civic, Business Leaders & Others

- Pictou County Chamber of Commerce President
- · Pictou County Chamber of Commerce Executive Director
- Forest Nova Scotia Executive Director
- · Forest Nova Scotia key directors and members
- · Industrial and commercial business owners

- · Contractors and suppliers company officials
- · Union leaders Unifor Atlantic, Regional, National
- Lobster Fishermen, Fisheries Groups (First Nation and non)
- Nova Scotia Sawmills
- Tourism operators (DEANS)
- Halifax Port Authority
- · Halifax Chamber of Commerce